UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
---X
DANIELLE SCHNEIDER,

Plaintiff,

-against-

NORTHERN ALLIANCE MANAGEMENT, LLC,

Defendant.
---X

Civil Action No.:

COMPLAINT

DEMAND FOR JURY TRIAL

Plaintiff DANIELLE SCHNEIDER ("Plaintiff"), by and through her attorneys, The Law Office of Alan J. Sasson, P.C., as and for her Complaint against the Defendant NORTHERN ALLIANCE MANAGEMENT, LLC, hereinafter referred to as "Defendant", respectfully sets forth, complains and alleges, upon information and belief, the following:

INTRODUCTION/PRELIMINARY STATEMENT

1. Plaintiff brings this action for damages and declaratory and injunctive relief arising from the Defendant's violation(s) of §1692 et seq. of Title 15 of the United States Code, commonly referred to as the Fair Debt Collections Practices Act ("FDCPA").

PARTIES

2. Plaintiff is a resident of the State of New York, residing at 1860 Brown Street, Brooklyn, New York and is a "consumer" as that term is defined by 15 U.S.C. 1692a(3).

3. Defendant is a New York limited liability company engaged in the business of collecting debts with its principal place of business located at 3842 Harlem Road, Suite 400-228, Cheektowaga, New York 14215.

4. Defendant is a "debt collector" as the phrase is defined and used in the FDCPA under 15 U.S.C. §1692a(6).

JURISDICTION AND VENUE

5. The Court has jurisdiction over this matter pursuant to 28 USC §1331, as well as 15 USC §1692 *et seq*. and 28 U.S.C. §2201. If applicable, the Court also has pendent jurisdiction over the state law claims in this action pursuant to 28 U.S.C. §1367(a).

6. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b)(2).

FACTUAL ALLEGATIONS

7. Plaintiffs repeats, reiterates and incorporates the allegations contained in paragraphs numbered "1" through "6" herein with the same force and effect as if the same were set forth at length herein.

8. On or about June 18, 2014, Plaintiff received a call from a representative of Defendant, who attempted to collect on a debt allegedly owed by the Plaintiff.

9. Defendant called from the phone number of 347-753-9248, which number belongs to the Defendant. Plaintiff ascertained that Defendant owns such number by calling back that number and speaking to an individual who identified themselves as a representative of the Defendant.

10. During the June 18 conversation, Defendant's representative attempted to collect on a debt allegedly owed by the Plaintiff for a TD Bank account.

11. Plaintiff responded to Defendant's representative that she disputed the debt, as she did not owe TD Bank any money.

12. Defendant's representative failed to take the Plaintiff's oral dispute, and instead threatened the Plaintiff that she would go to jail if she did not immediately pay this debt.

13. Plaintiff is not subject to imprisonment even if she owed a debt, and Defendant's threat that Plaintiff would go to jail if she failed to pay was therefore false, deceptive and

misleading.

14. 15 USC §1692e(10) prohibits debt collectors from using any false, deceptive, or misleading representations or means in connection with the collection of any debt.

FIRST CAUSE OF ACTION
(Violations of the FDCPA)

15. Plaintiff repeats, reiterates and incorporates the allegations contained in paragraphs numbered "1" through "14" herein with the same force and effect as if the same were set forth at length herein.

16. Defendant's debt collection efforts attempted and/or directed towards the Plaintiff violated various provisions of the FDCPA, including but not limited to 15 USC §1692e(10), which prohibits debt collectors from using any false, deceptive, or misleading representations or means in connection with the collection of any debt.

17. As a result of Defendant's violations of the FDCPA, Plaintiff has been damaged and is entitled to damages in accordance with the FDCPA.

DEMAND FOR TRIAL BY JURY

16. Plaintiff hereby respectfully requests a trial by jury for all claims and issues in its Complaint to which it is or may be entitled to a jury trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment from the Defendant as follows:

A. For actual damages provided and pursuant to 15 USC §1692k(a)(1);

B. For statutory damages provided and pursuant to 15 USC §1692k(2)(A);

C. For statutory damages provided and pursuant to 15 USC §1692k(2)(B);

D. For attorneys' fees and costs provided and pursuant to 15 USC

§1692k(a)(3);

E. A declaration that the Defendant's practices violated the FDCPA;

F. For any such other and further relief, as well as further costs, expenses and disbursements of this action, as this Court may deem just and proper.

Dated: Brooklyn, New York
June 19, 2014

Respectfully submitted,

By:/s/ Yitzchak Zelman_______________

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